

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN**

REPUBLICAN NATIONAL  
COMMITTEE,

*Plaintiff,*

v.

No. 3:22-cv-00037-RAM-RM

JOHN CANEGATA; ROBERT MAX  
SCHANFARBER; and VIGOP (VIRGIN IS-  
LANDS REPUBLICAN PARTY), also known  
as VIGOP PAC,

*Defendants.*

**JOINT STATUS REPORT**

Plaintiff Republican National Committee and Defendants John Canegata, Robert Max Schanfarber, and VIGOP (Virgin Islands Republican Party) submit the following report regarding the settlement.

1. On July 13, 2023, the RNC and Defendants signed the Settlement Agreement. Defendants agreed to not use or otherwise dilute or infringe on the RNC's trademarks, unless given express license by the RNC. Defendants also agreed to dissolve the VIGOP PAC and file a termination notice with the Federal Election Commission within 45 days after July 13, 2023 (by August 28, 2023). Defendants further agreed to immediately and voluntarily dismiss the entire action against all defendants in *Republican Party of the Virgin Islands v. Ackley*, No. SX-2022-CV-00131, pending before the Superior Court of the Virgin Islands. And Defendants signed acknowledgements, disclaiming any leadership role in the Republican Party of the Virgin Islands and the Republican National Committee and acknowledging that the current leaders of the Republican Party of the Virgin Islands were elected at the March 29, 2022 caucus held by the Party and overseen by the RNC.

2. In exchange, the RNC agreed to move this Court to stay further proceedings in this case and hold this case in abeyance until Defendants complete the tasks specified in preceding paragraphs—namely, dissolving the VIGOP PAC and dismissing the Superior Court action. Under the Settlement Agreement, however, the RNC retains the right to litigate this case to final judgment and obtain all appropriate relief under the Lanham Act, including to remedy past violations with actual, statutory, and/or treble damages and to obtain permanent, prospective relief, from this Court if Defendants do not complete all the tasks.

3. On July 14, 2023, the RNC moved to stay the litigation, including the July 18, 2023 hearing on the RNC's motion for sanctions, so that the parties can voluntarily effectuate the terms of the Settlement Agreement. On the same day, this Court stayed the case and continued the July 18 sanctions hearing without a date.

4. Consistent with the Settlement Agreement, Defendants voluntarily dismissed their Superior Court action. *See* Notice of Voluntary Dismissal, *Republican Party of the V.I. v. Ackley*, No. SX-2022-CV-131 (V.I. Super. Ct. July 25, 2023).

5. On October 2, 2023, Defendants informed the RNC that the FEC approved and executed the conciliation agreement between the FEC and the VIGOP PAC, under which the VIGOP PAC would be permitted to terminate itself if it pays the negotiated penalties by November 1, 2023. Counsel for Defendants informed the RNC's counsel that Defendants are working to transfer the payment to the FEC and to ensure the VIGOP PAC's termination.

6. In light of these developments, the parties jointly request that the Court continue to hold this case in abeyance for an additional 30 days. Consistent with the terms of the Settlement Agreement, the RNC will voluntarily move to dismiss this case when the VIGOP PAC terminates itself. To the extent that the termination gets delayed for any reason at the FEC, the parties will file another Joint Status Report to this Court no later than November 10, 2023.

\* \* \*

For the foregoing reasons, and other good cause found, the parties request that the Court continue to hold this litigation in abeyance. To the extent that the case is not yet dismissed, the parties will file another Joint Status Report no later than November 10, 2023 regarding the status of the VIGOP PAC's termination.

Dated: October 12, 2023

/s/ Kevin F. D'Amour

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Respectfully submitted,

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